

## **U.S. Comments on Draft Texts of Chapter 2.3.13 (Bovine Spongiform Encephalopathy) of the OIE *International Animal Health Code***

**(Submitted to the OIE on May 8, 2002)**

Thank you for the opportunity to provide you with our comments on this Code Chapter. First, we would like to make the following small observations, which the Commission may have overlooked when drafting the Chapter:

1. Article 2.3.13.3 2)b) and Article 2.3.13.4 2)b): We suggest that in addition to removing the offspring of a positive imported dam, any birth cohorts of that positive imported dam (if imported with that dam) should also be removed since such animals would have also been likely exposed to the same feed source.
2. Article 2.3.13.8: If embryos are going to be permitted to be traded without restriction, then they (like semen) should not be considered to be a risk factor for BSE as shown in Article 2.3.13.2. This may have been an oversight when drafting the updated Chapter.
3. Article 2.3.13.11: Statement 2) found in Article 2.3.13.12 (“the feeding of ruminants with *meat-and-bone meal* (MBM) and greaves derived from ruminants has been banned and the ban has been effectively enforced”) should also be included in this article. Whether a country or zone is of low, moderate or high risk for BSE, such feeding of MBM to ruminants should be banned.
4. Article 2.3.13.11 2)a) and Article 2.3.13.12 3)a): This is similar to our comment we made in Item 1 above. In this case, if you are importing cattle, such cattle should neither be “the progeny **or birth cohorts** of BSE suspect or confirmed females”. Again, this is because any birth cohorts of suspect or confirmed females would have also been exposed to the same feed source.
5. Article 2.3.13.17 2): This may be a typo error. Why was the age cut-off changed from 6 to 9 months?
6. Article 2.3.13.18: The United States continues to strongly object to any statement recommending the trade (importation) of ruminant MBM from countries with native cases of BSE in their cattle. Whether a country is low, moderate or high risk for BSE, contaminated MBM is the main, if not only, vehicle for the transmission of BSE. No rendering process is 100% effective, and furthermore, no country has facilities, transport conveyances, etc. to handle poultry and swine feed completely separate from ruminant feed. The cross-contamination problem is believed to be the principal cause for how BSE spread to a number of countries. For this very reason, the European Union’s strict regulations prohibit the export of MBM from affected countries. It is, therefore, very irresponsible for the OIE to continue to make this recommendation.

7. Article 2.3.13.19: The specified risk materials (SRMs) described in this Article are tissues which have a probability of containing BSE. Therefore, such materials should not be allowed to be traded, no matter how low the BSE prevalence of a country may be.
8. Article 2.3.13.20: Since skulls are associated with the highest risk tissue (brain) for BSE, we recommend that skulls from any country with BSE not be used for the manufacture of gelatin.

Thank you for the opportunity to review this Chapter and for kindly considering our comments.

Sincerely,

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